

1 Aaron L. Agenbroad (State Bar No. 242613)
2 alagenbroad@jonesday.com
2 JONES DAY
3 555 California Street, 26th Floor
3 San Francisco, CA 94104
4 Telephone: (415) 626-3939
4 Facsimile: (415) 875-5700

5 Attorneys for WASHINGTON GROUP
6 INTERNATIONAL, INC., A DIVISION OF URS
CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: KATRINA CANAL BREACHES
CONSOLIDATED LITIGATION**

PERTAINS TO: MRGO

(PENDING IN THE UNITED STATES
DISTRICT COURT FOR THE EASTERN
DISTRICT OF LOUISIANA AS CIVIL
ACTION NO. 05-4182 "K" (2) BEFORE
HON. STANWOOD R. DUVAL, JR.).

Defendant.

**Case No. MISC. NO. 08-CV-
80007MISC (PJH)**

**STIPULATION AND [PROPOSED]
ORDER WITHDRAWING ALL
DISCOVERY MOTIONS**

Date: April 16, 2008
Time: 10:00 a.m.
Courtroom: G, 15th Floor
Judge: Hon. Bernard Zimmerman

WHEREAS, the Court has currently scheduled a hearing on the pending Discovery Motions (i.e. the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production; the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation; the February 14, 2008 MR-GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production; and the February 28, 2008 WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation (collectively the “Discovery Motions”)) for April 16, 2008 at 10:00 a.m.;

WHEREAS, through mutual effort the Parties have resolved the outstanding issues and

1 documents responsive to Washington Group International, Inc.'s ("WGII") individual and
 2 organizational subpoenas have been produced;

3 WHEREAS, this mutual resolution has mooted the Discovery Motions and any need for
 4 the April 16, 2008 hearing;

5 IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that the
 6 various Discovery Motions are hereby collectively withdrawn by the parties.

8
 9 Dated: March 26, 2008

/s/ Aaron L. Agenbroad

Aaron L. Agenbroad (State Bar No. 242613)
 alagenbroad@jonesday.com
 Jones Day
 555 California Street
 26th Floor
 San Francisco, CA 94104-1500
 Telephone: (415) 626-3939
 Facsimile: (415) 875-5700

14
 15 Attorneys for Washington Group
 16 International, Inc., a division of URS
 17 Corporation

18 Dated: March 26, 2008

/s/ Joseph C. Wilson

Joseph C. Wilson (State Bar No. 249027)
 jwilson@cpmlegal.com
 Cotchett, Pitre & McCarthy
 San Francisco Airport Office Center
 840 Malcom Road, Suite 200
 Burlingame, CA 94010
 Telephone: (650) 697-6000
 Facsimile: (650) 697-0577

21
 22 Attorneys for MR-GO Plaintiffs' Sub-Group
 23 Litigation Committee

1 Dated: March 26, 2008

/s/ Christopher M. Patti

2 Christopher M. Patti
3 Christopher.Patti@ucop.edu
4 University of California
5 Office of the General Counsel
1111 Franklin Street, 8th Floor
Oakland, California 94607-5200
Telephone: (510) 987-9739
Facsimile: (510) 987-5757

6 Attorney for U.C. Berkeley and Professors
7 Reimer, Seed, Pestana and Bray

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

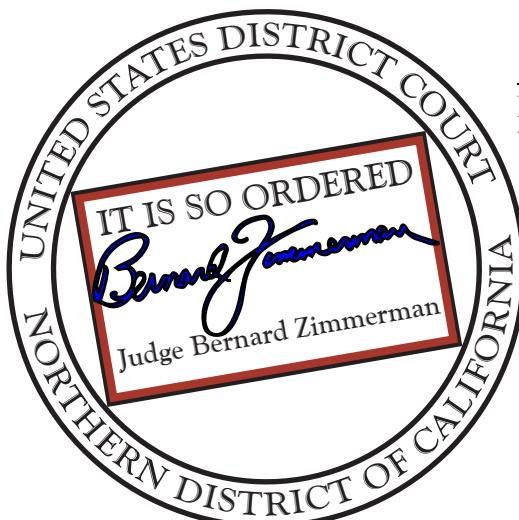
The Court, having considered the above stipulation of the parties, and good cause appearing, hereby ORDERS that:

- the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production;
- the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation;
- the February 14, 2008 MR-GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production;
- the February 28, 2008 WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation; and
- any other associated motions or cross motions,

are hereby deemed withdrawn by the respective parties and the April 16, 2008 hearing date on these motions and cross motions is hereby VACATED.

IT IS SO ORDERED.

Dated: March 27, 2008




HON. BERNARD ZIMMERMAN
United States Magistrate Judge